

1 MCGREGOR W. SCOTT  
United States Attorney  
2 ADRIAN T. KINSELLA  
Assistant United States Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700  
Facsimile: (916) 554-2900  
5

6 Attorneys for Plaintiff  
United States of America  
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9 IN THE UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
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13 Plaintiff,  
14  
15 v.  
16 STEVEN LAWRENCE ROBINSON, and,  
NATHANIEL OPONDO HUBBERT,  
Defendants.

CASE NO. 2:20-CR-00123-JAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: August 4, 2020  
TIME: 9:30 a.m.  
COURT: Hon. John A. Mendez

17 **STIPULATION**

- 18 1. By previous order, this matter was set for status on August 4, 2020.
- 19 2. By this stipulation, defendants now move to continue the status conference until  
20 September 1, 2020 at 9:30 a.m., and to exclude time between August 4, 2020, and September 1, 2020,  
21 under Local Code T4.
- 22 3. The parties agree and stipulate, and request that the Court find the following:
- 23 a) The government has represented that the discovery associated with this case  
24 includes over eight gigabytes of evidence in electronic form, including police reports, pictures,  
25 multiple hours of video footage, laboratory reports, search warrants, and a forensic cellular  
26 phone report. The government has represented to defense counsel that it has provided the  
27 majority of this initial discovery and anticipates providing the remaining initial discovery by  
28 August 4, 2020.

1           b) Counsel for defendants desire additional time consult with their clients, review the  
2 existing discovery, to discuss potential resolutions with their clients, and to otherwise prepare for  
3 trial.

4           c) Counsel for defendants believe that failure to grant the above-requested  
5 continuance would deny them the reasonable time necessary for effective preparation, taking into  
6 account the exercise of due diligence.

7           d) The government does not object to the continuance.

8           e) Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11           f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of August 4, 2020 to September 1,  
13 2020, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
14 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
15 of the Court's finding that the ends of justice served by taking such action outweigh the best  
16 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 3, 2020

McGREGOR W. SCOTT  
United States Attorney

/s/ ADRIAN T. KINSELLA  
ADRIAN T. KINSELLA  
Assistant United States Attorney

Dated: August 3, 2020

/s/ MEGAN T. HOPKINS  
MEGAN T. HOPKINS  
Counsel for Defendant  
STEVEN LAWRENCE ROBINSON

Dated: August 3, 2020

/s/ KRESTA DALY  
KRESTA DALY  
Counsel for Defendant  
NATHANIEL OPONDO HUBBERT

### FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 3<sup>rd</sup> day of August, 2020.

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE